

Brian A. Bender, Esq. (BAB-0218)
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Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAMIRO RAMIREZ,

Plaintiff,

-against-

80 LAFAYETTE ASSOCIATES, LLC, B.R. FRIES &
ASSOCIATES, INC., BATTERY PARK CITY
AUTHORITY, BLUE MILLENNIUM REALTY LLC,
CENTURY 21, INC., EMPIRE STATE PROPERTIES,
INC., GRUBB & ELLIS MANAGEMENT SERVICES,
HILLMAN ENVIRONMENTAL GROUP, LLC,
HUDSON TOWERS HOUSING CO., INC., LEFRAK
ORGANIZATION, INC., MAYORE ESTATES LLC,
MAYORE ESTATES LLC AND 80 LAFAYETTE
ASSOCIATION LLC AS TENANTS IN COMMON,
RECTOR OF TRINITY CHURCH, AND STONER AND
COMPANY, INC.,

Defendants.

Case No.:
08-CV-2694

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as
and for its response to the allegations set forth in the Complaint by Adoption (Check-Off
Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts
its Verified Master Answer dated July 30, 2007, which was filed in the matter of In Re: World
Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). LEFRAK
ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102

(AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
April 26, 2008

Yours, etc.,

HARRIS BEACH PLLC

/s/
Brian A. Bender, Esq. (BAB-0218)
Attorneys for Defendant
LEFRAK ORGANIZATION, INC.
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**CERTIFICATE OF
SERVICE**

The undersigned certifies that on April 26, 2008, I caused to be filed and served the following documents electronically via the Court's ECF system upon the parties:

1. Notice of Adoption of Answer to Master Complaint of Lefrak Organization, Inc.

Dated: New York, New York
April 26, 2008

/s/

Brian A. Bender

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21 MC 102 (AKH)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAMIRO RAMIREZ,

Case No.:
08-CV-2694

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-against-

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